VC Theoretical Explanation of Double Descent

Anonymous Author(s) Affiliation Address email

Abstract

There has been growing interest in generalization performance of large multilayer 1 neural networks that can be trained to achieve zero training error, while generalizing 2 3 well on test data. This regime is known as 'second descent' and it appears to contradict conventional view that optimal model complexity should reflect optimal 4 balance between underfitting and overfitting, aka the bias-variance trade-off. This 5 paper presents VC-theoretical analysis of double descent and shows that it can be 6 fully explained by classical VC generalization bounds. We illustrate an application 7 of analytic VC-bounds for modeling double descent for classification problems, 8 using empirical results for several learning methods, such as SVM, Least Squares, 9 and Multilayer Perceptron classifiers. In addition, we discuss several possible 10 reasons for misinterpretation of VC-theoretical results in the machine learning 11 community. 12

13 1 Introduction

There have been many recent successful applications of Deep Learning (DL). However, at present time, 14 various DL methods are driven mainly by heuristic improvements, while theoretical and conceptual 15 understanding of this technology remains limited. For example, large neural networks can be trained 16 to fit available data (achieving zero training error) and still achieve good generalization for test data. 17 This contradicts conventional statistical wisdom that overfitting leads to poor generalization. This 18 19 phenomenon has been systematically described by Belkin, et al. [1] who introduced the appropriate terminology ('double descent') and pointed out the difference between the classical regime (first 20 descent) and the modern one (second descent). This disagreement between the classical statistical 21 view and modern machine learning practice provides motivation for new theoretical explanations of 22 the generalization ability of DL networks and other over-parameterized estimators. Several different 23 explanations include: special properties of multilayer network parameterization [2], choosing proper 24 inductive bias during second descent [1], effect of Stochastic Gradient Descent (SGD) training 25 [3, 4, 5], the effect of various heuristics (used for training) on generalization [6], and the effect of 26 27 margin on generalization [7]. The current consensus view on the 'generalization paradox' in DL networks is summarized below: 28

29 30	 Existing indices for model complexity (or capacity), such as VC-dimension, cannot explain generalization performance of DL networks.
31	- 'Classical' theories developed in ML and statistics cannot explain generalization performance
32	of DL networks. In particular, classical VC generalization bounds cannot be used to explain
33	double descent. Specifically, the ability of large DL networks to achieve zero training error
34	(during second descent mode) effectively 'rules out all of the VC-dimension arguments as a
35	possible explanation for the generalization performance of state-of-the-art neural networks'
36	[3].

³⁷ This paper demonstrates that these assertions are incorrect, and that classical VC-theoretical results

can fully explain generalization performance of DL networks, including 'double descent', for classifi-

cation problems. In particular, we show that proper application of VC-bounds using correct estimates

of VC-dimension provides accurate modeling of double descent curves, for various classifiers trained
 using stochastic gradient descent (SGD), least squares loss and standard SVM loss. The proposed

VC-theoretical explanation provides many additional insights on generalization performance during

- 43 first descent vs. second descent, and on the effect of statistical properties of the data on the shape of
- 44 double descent curves.
- Next, we briefly review VC-theoretical concepts and results necessary for understanding generaliza tion performance of all learning methods based on minimization of training error [8, 9, 10, 11]:

1. Finite VC dimension provides *necessary* and *sufficient* conditions for good generalization.

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 2. VC theory provides analytic bounds on (unknown) test error, as a function of training error, VC dimension and the number of training samples.

Clearly, these VC-theoretic results contradict an existing consensus view that VC-theory cannot
 account for generalization performance of large DL networks. This disagreement results from
 misinterpretation of basic VC-theoretical concepts in DL research. These are a few examples of such
 misunderstanding:

A common view that VC-dimension grows with the number of parameters (weights), and
 therefore, 'traditional measures of model complexity struggle to explain the generalization
 ability of large artificial neural networks' [3]. In fact, it is well known that VC-dimension
 can be equal, or larger, or smaller, than the number of parameters [8, 11].

Another common view is that 'VC dimension depends only on the model family and data distribution, and not on the training procedure used to find models' [12]. In fact, VC dimension does not depend on data distribution [8, 11, 13]. Furthermore, VC dimension certainly depends on SGD algorithm [8, 11].

For classification problems, VC theory provides analytic generalization bounds for (unknown)
Prediction Risk (or test error), as a function of Empirical Risk (or training error) and VC-dimension
(*h*) of a set of admissible models, aka approximating functions. That is, for a given training data set
(of size *n*), VC generalization bound has the following form [8, 9, 10, 11]:

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$$R_{tst} \le R_{trn} + \frac{\varepsilon}{2} \left(1 + \sqrt{1 + \frac{4R_{trn}}{\varepsilon}} \right) \tag{1}$$

where
$$\varepsilon = \frac{a_1}{n} \left(h \left(\ln \left(\frac{a_2 n}{h} \right) + 1 \right) - \ln \frac{\eta}{4} \right), \eta = \min \left(\frac{4}{\sqrt{n}}, 1 \right)$$

⁶⁷ This VC bound (1) holds with probability $1 - \eta$ (aka *confidence level*) for all possible models ⁶⁸ (functions) including the one minimizing the training error (R_{trn}). The second additive term in (1), ⁶⁹ called the *confidence interval*, aka *excess risk*, depends on both the empirical risk (training error) ⁷⁰ and VC dimension (*h*). This bound describes the relationship between training error, test error and ⁷¹ VC-dimension, and it is often used for *conceptual understanding* of model complexity control, i.e. ⁷² understanding the effect of VC-dimension on test error. Application of this bound for accurate ⁷³ modeling of double descent curves requires:

- 74 Selecting proper values of positive constants a_1 and a_2 . The worst-case values $a_1 = 4$ and 75 $a_2 = 2$, provided in VC-theory [8, 9] result in VC-bounds that are too loose for real-life 76 data sets [11]. For classification problems, we suggest using the values $a_1 = a_2 = 1$, used 77 for all empirical results presented in this paper.
- Analytic estimate of VC-dimension. For many learning methods, including DL, analytic estimate of VC-dimension are not known. For example, for SGD style algorithms, the effect of various heuristics (e.g., initialization of weights, etc.) on VC-dimension is difficult (or impossible?) to quantify analytically.

Note that VC bound (1) provides conceptual explanation of both first and second descent. That is, first descent corresponds to minimizing this bound when training error is non-zero [8, 9, 11]. Whereas

- second descent corresponds to minimizing this bound when training error is kept at zero, using a set
- ⁸⁵ of models having small VC-dimension. This can be shown by setting the training error in bound (1)
- to zero, resulting in the following simplified bound for test error during the second descent:

$$R_{tst} \le \varepsilon, \qquad \text{where } \varepsilon = \frac{h}{n} \left(\ln \left(\frac{n}{h} \right) + 1 \right)$$
 (2)

More formally, since VC bound (1) depends only on two factors, training error and VC-dimension,
there are two different strategies for minimizing this bound [11]:

For a set of functions (models) with fixed VC-dimension, reduce the training error. This
 strategy leads to well-known classical bias-variance trade-off aka 'first descent';

For small (fixed) training error, minimize the VC-dimension. This strategy corresponds to
 second descent, when training error is zero.

These two strategies correspond to *different methods* for controlling VC-dimension, that have been
known long before DL. For example, the second strategy corresponds to margin maximization in
SVM. Traditional learning methods typically implement a *single strategy*, whereas practitioners in
DL observed the effect of *both strategies* when varying a single hyper parameter, such as network
size or the number of epochs.

The main technical reason for misapplication of VC-theory, besides misinterpretation of VC-98 dimension, is that VC bound (1) remains virtually unknown in the DL community. That is, all 99 technical arguments suggesting that VC-theory is unable to explain double descent, are based on 100 analysis of uniform convergence bounds [1, 3, 14, 15, 16, 17]. In such bounds, the confidence interval 101 term, aka the excess error, is of the order $\mathcal{O}\left(\sqrt{h/n}\right)$, i.e. it does not depend on empirical risk 102 (training error). However, VC-theory also provides more accurate uniform relative convergence 103 bounds, such as VC-bound (1), presented in [8, 9, 10, 11], where the confidence interval term also 104 depends on the training error. So, whereas it is true that uniform convergence bounds cannot explain 105 double descent, it can be fully explained by uniform relative convergence bounds. 106 Training of DL networks is based on stochastic gradient descent (SGD), which incorporates several 107 heuristic rules to ensure that the norm of weights remains small. These rules include: initialization of 108

weights to small random values and re-normalization during training. Consequently, for large DL
 networks, the model complexity is determined by the norm of weights, rather than the number of
 weights (parameters). Further, this dependence of VC-dimension on the training algorithm helps
 explain why theoretical estimates of VC-dimension based only on network topology have found little

¹¹³ practical use [11].

114 2 Application of VC Bounds for Modeling Double Descent

This section presents a VC-theoretical explanation of double descent for classification, for a singlelayer network shown in Figure 1. The same network setting was used for analysis of double descent
in recent papers [1, 18, 19, 20]. In this network, a classifier is estimated in two steps:

First, input vector x is encoded using N nonlinear features. Commonly, *random features* (weak features) are used, such as random ReLU or Random Fourier Features (RFF);

- Second, a linear model is estimated in this N-dimensional feature space.

This simplified setting enables VC theoretical analysis of double descent, because the analytic estimates of VC-dimension are known. That is, since the network output is formed as a linear combination of N features, analytic estimate of VC-dimension for linear hyperplanes f(z, w) =(wz) + b is known [8, 9, 10]:

$$h \le \min\left(||\boldsymbol{w}||^2, N\right) + 1 \tag{3}$$

This bound holds under the assumption that all training samples are enclosed within a sphere of radius 1, in **Z**-space. In summary, VC-dimension can be bounded by the input dimensionality (N), or

by the norm of weights. These are two different mechanisms for controlling VC-dimension.

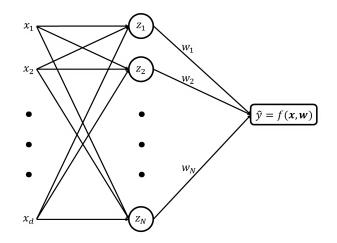


Figure 1: Single hidden layer network estimating a linear classifier in nonlinear feature space (\mathbf{Z} -space).

The double descent phenomenon can be observed for various learning methods used to estimate weights w for the network structure in Figure 1. Next, we present empirical results showing the application of VC bounds (1) and (3) for modeling double descent when network weights are estimated using SVM or Least-Squares (LS) classifiers. For large networks trained using LS, when N is larger than sample size (n), minimization of squared error is performed using pseudo-inverse, which finds a solution corresponding to the minimization of the norm squared $||w||^2$.

In all experimental results in this section, double descent is observed when the network size (N) is gradually increased. Specifically, according to analytic bound (3):

When network size (N) is small, the VC-dimension initially grows linearly with N. This corresponds to the first descent, or traditional bias-variance trade-off.

For overparameterized networks (large N), VC-dimension is controlled by the norm squared of weights, leading to second descent.

We use two types of random nonlinear features [1, 21], ReLU and RFF. Random ReLU features are
formed as:

$$\boldsymbol{Z}_i = \max\left(\langle \boldsymbol{v}_i, \boldsymbol{X} \rangle, 0\right), \quad i = 1, ..., N$$

where random vectors v_1, \ldots, v_N are sampled uniformly from the range [-1,1]. Random Fourier Features (RFF) are formed as:

$$\boldsymbol{Z}_{i} = \exp\left(\sqrt{-1}\langle \boldsymbol{v}_{i}, \boldsymbol{X} \rangle\right), \quad i = 1, ..., N$$

Where random v_1, \ldots, v_N are sampled from Gaussian distribution with standard deviation $\sigma = 0.05$. In all experiments, input (x) values were pre-scaled to [0, 1] range, for both training and test data.

Following the nonlinear mapping $\mathbf{X} \to \mathbf{Z}$, all *z*-values are re-scaled to [-1, 1] range. Such re-scaling is performed to satisfy the condition for bound (3), stating that all training samples in **Z**-space should be enclosed within a sphere of radius 1.

Training samples (z, y) are used to estimate a decision boundary in **Z**-space. Two different methods (LS and SVM classifiers) are used for estimating linear decision function f(z, w) = (wz) + b from training data, in order to show double descent curves for two *different loss functions*, LS and SVM loss. For SVM modeling, the regularization parameter *C* is set to 64 in all experiments. Empirical test error is estimated using an independent test set.

Most empirical results in this paper were obtained for MNIST digits adapted for binary classification (digit 5 vs 8), where digits are grey-scale images of size 28x28. The training set size n = 800, and test set size is 2,000. We have also used other data sets for modeling and observed similar results. See Appendix for additional results.

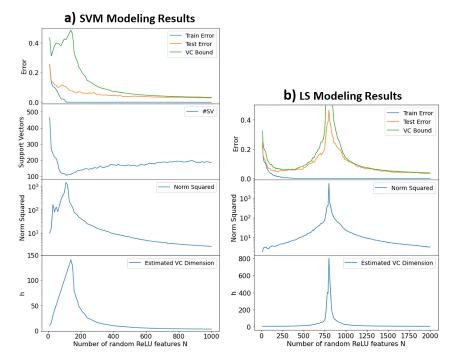


Figure 2: Application of VC-bounds for MNIST digit 5 vs 8 data set using random ReLU features.

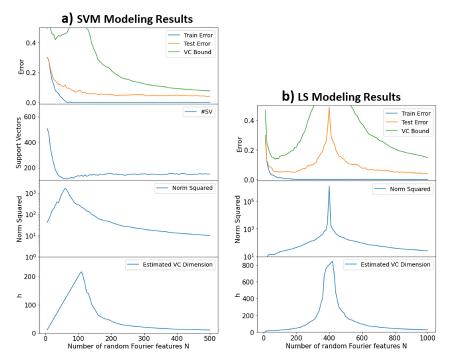


Figure 3: Application of VC-bounds for MNIST digit 5 vs 8 data set using RFF.

Empirical results in Figures 2 and 3 show application of VC bounds to modeling MNIST data. They show:

Empirical training and test error curves, as a function of N (the number of nonlinear features), along with VC-theoretical estimate of test error obtained via bounds (1) and (3).
 These curves show that analytic VC-bounds can explain (and predict) double descent;

- The 'norm squared' of estimated linear model, as a function of the number of features N;
- 164 For SVM, we also show the number of support vectors for trained SVM model.

Modeling results for random ReLU and RFF features are similar, so we only comment on results in Figure 2:

- *For small N*, VC-dimension grows linearly with N for SVM method. Empirical results show that first descent error curves can be explained by VC-bound (1), because the minimum of VC-bound closely corresponds to the minimum of test error. This can be clearly seen for LS classifier, and less obvious for SVM.
- *For large N*, VC-dimension is controlled by the norm squared, according to bound (3). These
 results show that second descent can be explained by VC-bound (1), for both SVM and LS
 learning methods.

Whereas empirical results for both SVM and LS in Figure 2 are qualitatively similar, their double descent curves show different values of *interpolation threshold* N* (where the training error reaches zero). For SVM, the value N* \approx 100 is achieved when the number of features equals the number of support vectors. For LS classifier, the interpolation point N* \approx 800 is achieved when the number of features equals the number of training samples.

The dependence of test error on the norm of weights in large networks has been known to practitioners, and some limited theoretical explanation is provided in [1, 22, 23]. For example, [1, 22] suggest that minimum norm provides inductive bias by favoring models with higher degree of smoothness. However, these papers do not mention VC bounds that clearly relate the VC-dimension to the norm of weights, and explain generalization performance for linear classifiers.

The dependence of interpolation threshold N* on training sample size for LS classifiers has also 184 been observed in the DL literature. However, in the absence of sound theoretical framework for 185 double descent, interpretation of this empirical dependency leads to convoluted explanations. For 186 example, Nakkiran, et al. [12] investigated the effect of varying the number of training samples on 187 test error, for a fixed-size DL network. In particular, they observed two double descent error curves 188 for the same network trained using smaller and larger size training data, showing that during second 189 descent, near interpolation threshold, the test error for a network trained with larger data set is worse 190 than for the same network trained on smaller data set. This phenomenon was called 'sample-wise 191 non-monotonicity', and a new theory was proposed for explaining regimes where 'increasing the 192 number of training samples actually hurts test performance'. However, this phenomenon has a simple 193 VC-theoretical explanation, as explained next. Note that for LS classifiers during second descent the 194 195 shape of the 'norm squared' closely follows the shape of test error, according to VC bound (2), as evident in Figures 2 and 3. Since for LS classifiers the interpolation threshold is given by training 196 sample size, there is a region near interpolation threshold, where VC-dimension for a smaller training 197 size is smaller than for a larger training size. According to VC-bound (2), in this region of second 198 descent we can expect a smaller (better) test error for a smaller training size. 199

VC theoretical framework can also help to understand the effect of statistical characteristics of training 200 201 data on generalization curves. Next, we present empirical results demonstrating the effect on noisy 202 data on the shape of double descent curves, along with their VC theoretical explanation. For these experiments, we use a single-layer network trained using SVM and LS classifier using random ReLU 203 features. We use digits data with corrupted class labels. The training set size is 800 (400 per class), 204 and the test set size is 2,000. Figure 4 shows the effect of noise level on the shape of double descent 205 curves, for SVM and LS classifiers. Results for both SVM and LS models show double descent 206 curves, but their shape is different. For the SVM model estimated using 'clean' data (0% label noise), 207 there is no visible first descent at all, but for noisy data we observe both first and second descent. 208 For the LS model, we clearly observe first and second descent for both clean and noisy training data. 209 For LS curves, the interpolation threshold (\approx training size 800) is the same for different noise levels, 210 but for SVM the value of interpolation threshold increases with noise level in the data. This can 211 be explained by noting that for SVM, the interpolation threshold is reached when the training data 212 becomes linearly separable (in nonlinear feature space, or Z-space in Figure 1). Therefore, for SVM 213 the interpolation threshold is given by the number of support vectors needed to separate training 214 data. For noisy data, a SVM model requires a larger number of support vectors, resulting in larger 215 interpolation threshold. 216

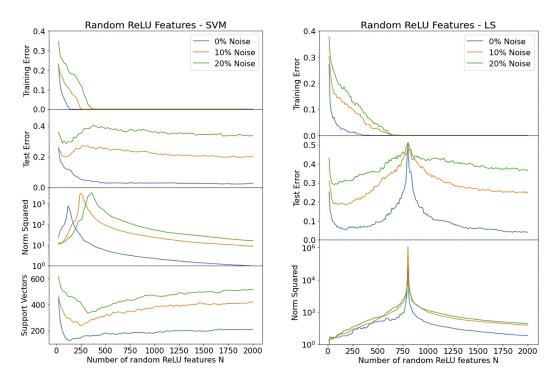


Figure 4: Effect of noise on double descent for MNIST data, for SVM and LS classifiers using random ReLU features.

The ability to generalize for noisy data can be explained by noting that during second descent VC bound (2) depends only on VC-dimension (the norm of weights). With increasing noise (in the data), the norm of weights increases, resulting in degradation of test error and flattening of second descent

test error curve (as evident in Figure 4, for both SVM and LS).

Empirical results in Figure 4 also show that for noisy data, generalization performance during second descent degrades, relative to optimal first descent model. This is contrary to the popular view that DL networks usually provide superior generalization performance during second descent [1, 3, 4, 12].

We suspect that superior performance during second descent, reported in the DL community, can be explained by using large and 'clean' data sets (common in Big Data). For such training data sets (of size *n*), generalization performance during second descent is likely to be good, because the VC bound (2) on test error depends only on the ratio of VC-dimension to sample size (h/n).

3 Modeling Double Descent for Fully Connected Multilayer Networks

Empirical results for a simplified network setting in Section 2 provide insights for generalization performance of over-parameterized multilayer networks. Such general DL networks use SGD training that keeps the norm of weights small, so that the model complexity is determined by the norm of weights, rather than the number of weights (parameters). However, direct application of analytic VC bounds to modeling double descent may be tricky, because we need to address two challenging research issues:

- How to estimate VC-dimension for general DL networks, where analytic estimates do not exist;
- 237
 2. Understanding design choices for setting multiple 'tuning' parameters, such as network
 width, number of training epochs, weight initialization, etc. All of these hyperparameters
 can be used to control the VC dimension of DL networks. Double descent curves show
 dependence of training and test error on a *single complexity parameter*, when all other tuning
 parameters are preset to 'good' values.

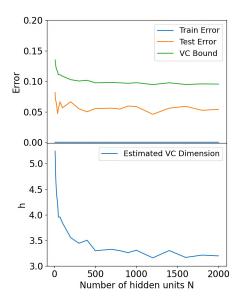


Figure 5: Modeling results for second descent as a function of network width (N).

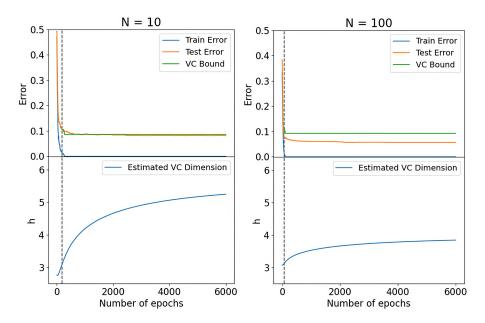


Figure 6: Second descent as a function of the number of epochs, for N = 10 and N = 100.

For these reasons, the application of analytic VC bounds to general DL networks is difficult (or impossible?). However, it can still be done for restricted and well-defined network settings. In this section, we consider a fully connected network with a single hidden layer, as in Figure 1, where the network weights in *both layers* are estimated during training via SGD. In this case, *z*-features are *adaptively estimated* from training data, in contrast to *fixed* random features used earlier in Section 2.

Let us consider two factors (hyperparameters) controlling complexity of such networks trained 247 via SGD: the number of hidden units (N), and the number of training epochs. Empirical results 248 showing double descent curves as a function of these two factors have been extensively reported in 249 DL literature [1, 12]. However, our purpose here is not to replicate such double descent curves, but to 250 explain them using VC bounds (1) and (3). In order to make it possible, we have to specify network 251 setting where VC-dimension can be approximately estimated. Therefore, we only consider modeling 252 for second descent, where training error is kept very small (or zero), and test error is bounded by (2). 253 This can be achieved when the number of hidden units N is large, or the number of training epochs is 254

large. So, our experiments intend to show application of VC bounds *only in such restricted settings*,
where varying one complexity factor (for example, N) has an effect on VC-dimension and test error,
according to bound (2).

Further, in order to estimate VC dimension, we hypothesize that under *such restricted settings*, during second descent, the norm of weights in the output layer can be used to approximate the VC-dimension of a neural network. The reasoning (behind this hypothesis) is that for such restricted settings the training error is zero, so a linear decision boundary in **Z**-space should have a large separation margin, i.e. VC dimension is controlled mainly by the norm of weights in the output layer. This assertion appears to be supported by experiments for fully connected networks, trained on several different data sets.

- Next, we present empirical results for MNIST digits data, under the following experimental setting:
- -200 training and 2,000 test examples (of digits 5 and 8);
- 267 Fully connected network using random ReLU activation function in hidden units [24];

- Training using SGD with learning rate 0.001 and momentum 0.95. The learning rate is reduced by 10% for every 500 epochs. Batch normalization is used during training.

– Weights initialized, prior to training, using Xavier uniform distribution, following [25].

Our design choices for SGD implementation mainly follows earlier studies [1, 25].

272 Figure 5 shows modeling results for second descent mode, as a function of the number of hidden units N (the number of epochs is set to 6000 in all experiments). The top part shows empirical training 273 and test error curves, and the VC-bound on test error, that closely approximates empirical test error. 274 The bottom part of the figure shows the VC-dimension, estimated as the norm squared of the output 275 layer weights (for trained network). Figure 6 shows modeling results for second descent mode, as 276 a function of the number of epochs (for networks with N = 10 and 100 hidden units). Note that 277 VC-bound and VC-dimension can be reliably estimated only in second descent mode, when training 278 error is close to zero. This region, where training error is smaller than 1%, is indicated by dotted 279 vertical line. These results show that in the region where training error is very small, increasing 280 the number of epochs results is a small increase in VC-dimension and a slight decrease of training 281 error. This is a particular form of memorization-complexity trade-off, implicit in VC bound (1), when 282 training error is very small (close to zero). 283

These results demonstrate applicability of VC bounds for modeling second descent in fully connected multilayer networks. In addition, we can see the effect of each complexity parameter (network size N and the number of epochs) on VC-dimension. This can be used for ranking tuning parameters, according to their ability to control VC-dimension of DL networks during second descent.

288 4 Summary

This paper provides a VC-theoretical explanation of 'double descent' in multilayer networks. We show that for simplified network structures where VC-dimension can be analytically estimated, VC generalization bounds can be applied directly to the model and predict a double descent phenomenon.

VC-theoretical framework is helpful for improved understanding of empirical results observed in DL, 292 such as: the effect of various heuristics on generalization, relative performance of first and second 293 descent, etc. Another important VC-theoretical insight is that during second descent VC-dimension 294 depends on the norm of weights. According to VC-theoretical explanation, second descent occurs 295 296 when zero training error is achieved using an estimator having small VC-dimension, i.e. small norm of weights. This phenomenon is general, and it does not depend on a particular training algorithm 297 or on a chosen parameterization (such as multilayer network). Therefore, double descent can be 298 observed for other learning methods, such as SVM estimators, and not only for DL networks trained 299 by SGD algorithm. 300

Empirical results presented in this paper contradict the consensus opinion that VC-theory cannot explain prediction performance of neural networks. Possible future work in this area may investigate VC theoretical modeling of double descent for *low-dimensional data*, and also for regression problems. Note that for regression problems VC-theoretical bounds have a different form [8, 9, 10, 11], and these bounds have not been previously used for modeling second descent.

306 **References**

- [1] Belkin, M., Hsu, D., Ma, S. & Mandal, S. (2019) Reconciling modern machine-learning
 practice and the classical bias-variance trade-off. *Proceedings of the National Academy of Sciences*, 116(32):15849-15854.
- [2] Bengio, Y. (2009) Learning deep architectures for AI. *Foundations and Trends in Machine Learning*, 2(1):1-127.
- [3] Zhang, C., Bengio, S., Hardt, M., Recht, B. & Vinyals, O. (2021) Understanding deep learning requires rethinking generalization. *Communications of the ACM*, 64(3):107-115.
- [4] Neyshabur, B., Tomioka, R. & Srebro, N. (2014) In search of the real inductive bias: On the role of implicit regularization in deep learning. *arXiv preprint arXiv:1412.6614*.
- [5] Dinh, L., Pascanu, R., Bengio, S. & Bengio, Y. (2017) Sharp minima can generalize for deep
 nets. In *International Conference on Machine Learning*, pages 1019-1028.
- [6] Srivastava, N., Hinton, G., Krizhevsky, A., Sutskever, I. & Salakhutdinov, R. (2014) Dropout: a
 simple way to prevent neural networks from overfitting. *Journal of Machine Learning Research*, 15(56):1929-1958.
- [7] Bartlett, P., Foster, D. & Telgarsky, M. (2017) Spectrally-normalized margin bounds for neural networks. In *Advances in Neural Information Processing Systems*, pages 6241-6250.
- [8] Vapnik, V. (1998) *Statistical Learning Theory*. John Wiley & Sons, New York.
- [9] Vapnik, V. (1999) *The Nature of Statistical Learning Theory*, Springer.
- [10] Vapnik, V. (2006) *Estimation of Dependencies Based on Empirical Data*, Second Edition,
 Springer.
- ³²⁷ [11] Cherkassky, V. & Mulier, F. (2007) *Learning from Data*, Second Edition, Wiley-Interscience.
- [12] Nakkiran, P., Kaplun, G., Bansal, Y., Yang, T., Barak, B. & Sutskever, I. (2021) Deep double
 descent: Where bigger models and more data hurt. *Journal of Statistical Mechanics: Theory and Experiment*, 2021(12).
- [13] Schölkopf, B., Smola, A.J. & Bach, F. (2002) *Learning with kernels: support vector machines, regularization, optimization, and beyond*, MIT press.
- 133 [14] Tewari, A. & Bartlett, P. (2014) Learning Theory. Academic Press Library in Signal Processing.
- [15] Bartlett. P., Montanari, A. & Rakhlin, A. (2021) Deep learning: a statistical viewpoint, *Acta Numerica*.
- [16] Koltchinskii, V. (2001) Rademacher penalties and structural risk minimization, *IEEE Transactions on Information Theory*, 47(5):1902-1914.
- [17] Sokolić, J., Giryes, R., Sapiro, G. & Rodrigues, M. (2017) Robust large margin deep neural
 networks, *IEEE Transactions on Signal Processing*, 65(16):4265-4280.
- [18] Belkin, M., Hsu, D. & J. Xu. (2020) Two Models of Double Descent for Weak Features, *SIAM Journal on Mathematics of Data Science*, 2(4).
- [19] Neal, B., Mittal, S., Baratin, A., Tantia, V., Scicluna, M., Lacoste-Julien, S. & Mitliagkas,
 I. (2018) A modern take on the bias-variance tradeoff in neural networks. *arXiv preprint arXiv:1810.08591*.
- [20] Hastie, T., Montanari, A., Rosset, S. & Ryan J. (2019) Surprises in high-dimensional ridgeless
 least squares interpolation. *arXiv preprint arXiv:1903.08560v5*.
- [21] Rahimi, A. & Recht, B. (2008) Random features for large-scale kernel machines. In *Advances in Neural Information Processing Systems*, pages 1177-1184.
- Belkin, M., Hsu, D., Ma, S. & Mandal, S. (2018) To understand deep learning we need to
 understand kernel learning. In *International Conference on Machine Learning*, pages 541-549.
- [23] Gunasekar, S., Woodworth, B., Bhojanapalli, S., Neyshabur, B. & N. Srebro. (2017) Implicit
 regularization in matrix factorization. In *Advances in Neural Information Processing Systems*,
 pages 6151-6159.

- [24] Paszke, A., Gross, S., Massa, F., Lerer, A., Bradbury, J., Chanan, G., Killeen, T., Lin, Z., Gimelshein, N., Antiga, L. & Desmaison, A. (2019) Pytorch: An imperative style, high-
- Gimelshein, N., Antiga, L. & Desmaison, A. (2019) Pytorch: An imperative style, highperformance deep learning library. In *Advances in Neural Information Processing systems*, pages 8026-8037.
- ³⁵⁸ [25] Glorot, X. & Bengio, Y. (2010) Understanding the difficulty of training deep feedforward ³⁵⁹ neural networks. In *Proceedings of Machine Learning Reseach*, pages 249-256.

360 Checklist

361	1. For all authors
362 363	 (a) Do the main claims made in the abstract and introduction accurately reflect the paper's contributions and scope? [Yes]
364 365 366	(b) Did you describe the limitations of your work? [Yes] We provide an explanation in section 3 that direct application of VC bound is possible only under restricted settings where analytic estimate of VC dimension are known.
367	(c) Did you discuss any potential negative societal impacts of your work? [No]
368 369	(d) Have you read the ethics review guidelines and ensured that your paper conforms to them? [Yes]
370	2. If you are including theoretical results
371	(a) Did you state the full set of assumptions of all theoretical results? [Yes]
372 373	(b) Did you include complete proofs of all theoretical results? [N/A] The paper does not contain any new theoretical concepts.
374	3. If you ran experiments
375 376 377	(a) Did you include the code, data, and instructions needed to reproduce the main experimental results (either in the supplemental material or as a URL)? [No] We have provided detailed description of dataset and experimental procedure in the main text.
378 379	(b) Did you specify all the training details (e.g., data splits, hyperparameters, how they were chosen)? [Yes]
380 381	(c) Did you report error bars (e.g., with respect to the random seed after running experi- ments multiple times)? [No]
382 383 384	(d) Did you include the total amount of compute and the type of resources used (e.g., type of GPUs, internal cluster, or cloud provider)? [N/A] This is not relavent since we are only using small dataset.
385	4. If you are using existing assets (e.g., code, data, models) or curating/releasing new assets
386	(a) If your work uses existing assets, did you cite the creators? [N/A]
387	(b) Did you mention the license of the assets? [N/A]
388 389	(c) Did you include any new assets either in the supplemental material or as a URL? $[N/A]$
390 391	(d) Did you discuss whether and how consent was obtained from people whose data you're using/curating? [N/A]
392 393	(e) Did you discuss whether the data you are using/curating contains personally identifiable information or offensive content? [N/A]
394	5. If you used crowdsourcing or conducted research with human subjects
395 396	(a) Did you include the full text of instructions given to participants and screenshots, if applicable? [N/A]
397 398	(b) Did you describe any potential participant risks, with links to Institutional Review Board (IRB) approvals, if applicable? [N/A]
399 400	(c) Did you include the estimated hourly wage paid to participants and the total amount spent on participant compensation? [N/A]